

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 11
)	
SIGMUND J. CHAVIS and)	Judge Pamela J. Hollis
HARRIET L. CHAVIS)	
)	Case No. 09-33560
Debtors.)	
)	Hearing: May 4, 2010 at 10:00 a.m.

NOTICE OF MOTION

To: See attached service list

PLEASE TAKE NOTICE that on May 4, 2010, at 10:00 a.m., I shall appear before the Honorable Pamela J. Hollis, or any other Judge sitting in her stead, in Courtroom 644, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and shall then and there present the Debtors' **Motion to Amend Order Reopening Case**, a copy of which is enclosed and is herewith served upon you, and at which time and place you may appear and be heard.

/s/ Philip Groben
One of Debtors' attorneys

Forrest L. Ingram, Esq. # 3129032
Philip Groben
Michael Ohlman
79 W. Monroe St., Suite 900
Chicago, IL 60603
(312) 759-2838

CERTIFICATE OF SERVICE

I, Philip Groben, an attorney, certify that I caused a true and correct copy of the foregoing notice and the document to which it refers to be served upon the parties listed on the attached service list, either by ECF electronic delivery or by regular mail, as indicated on the list, on or before April 21, 2010.

/s/ Philip Groben

SERVICE LIST

Via CM/ECF:

William T. Neary
Office of the U.S. Trustee, Region 11
219 South Dearborn, 8th Floor
Chicago, IL 60606

Alex D Moglia, ESQ
Moglia Advisors
1325 Remington Rd, Ste H
Schaumburg, IL 60173
847 884-8282

Via U.S. Post:

Sigmund J. Chavis
Harriet L. Chavis
449 W. Aldine Ave.
Chicago, IL 60657

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MOTION TO AMEND ORDER REOPENING CASE

NOW COME the Debtors and Debtors in Possession SIGMUND J. CHAVIS, and HARRIET L. CHAVIS (the “Debtors”), and move this Honorable Court to amend its order entered April 8, 2010 reopening Bankruptcy Case No. 09-33560, for these reasons:

1. On September 10, 2009 (the “Petition Date”), the Debtors filed the above captioned bankruptcy case in the Northern District of Illinois. Chapter 7 trustee Alex D. Moglia, ESQ was assigned to administer the case.
2. The voluntary petition filed on the Petition Date does not include information as to representation of the Debtor by an attorney. The voluntary petition is clearly incomplete as a number of Bankruptcy Schedules, the Statement Of Financial Affairs (“SOFA”), and other necessary documents were not filed.
3. On October 2, 2009 Neil Gantz Law Offices filed an appearance on behalf of the Debtors.
4. Between December 15, 2009 and December 17, 2009 Neil Gantz filed an Amended Petition, the chapter 7 SOFA, and a Declaration of Electronic Filing. No amended schedules were filed, nor were a Certifications of Completion of Instructional Course Concerning Personal Financial Management filed.

5. On March 8, 2010, chapter 7 trustee Moglia filed a report of no distribution and on March 9, 2010 the above captioned case was closed without discharge.

6. Debtors moved this court, *pro se*, to reopen their case on March 30, 2010. This Court granted Debtors' motion on April 8, 2010. The order entered by the Court states, "the case shall be closed no earlier than April 22, 2010."

7. The Debtor retained the law offices of Forrest L. Ingram, P.C. on April 20, 2010, an appearance by Forrest L. Ingram, P.C. on behalf of the Debtors was not filed pursuant to Local Rule 2090-5(A)(1).

8. Debtors ask this Court to amend its order reopening the bankruptcy case so that the earliest it can be closed is June 24, 2010; the Debtors ask for this time to accomplish two goals. The first goal is to ensure that all of Debtors' creditors are properly notified of the bankruptcy case. The second goal is to allow time for the Debtors' to file adversary actions to determine the dischargeability of certain tax debts.

WHEREFORE, the Debtors pray that the Court amend its order entered April 8, 2010 so that in place of the text "April 22, 2010" the order states "June 24, 2010," and such other and further relief as this Court deems just and equitable.

Respectfully submitted,

SIGMUND J. CHAVIS and
HARRIET L. CHAVIS

By: /s/ Philip Groben
One of their attorneys

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